Docket No.:	A.12-11-009
Exhibit No.:	
Date:	May 17, 2013
Witness:	Jeremy Waen

TESTIMONY OF THE MARIN ENERGY AUTHORITY ON PACIFIC GAS AND ELECTRIC COMPANY'S APPLICATION FOR 2014 GENERAL RATE CASE PHASE 1

APPLICATION OF PACIFIC GAS AND ELECTRIC COMPANY (U 39 E), AMONG OTHER THINGS, TO INCREASE RATES AND CHARGES FOR ELECTRIC AND GAS SERVICE EFFECTIVE ON JANUARY 1, 2014.

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Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for 2014 General Rate Case Phase 1

4 I. Introduction

5 The Marin Energy Authority ("MEA") is a Community Choice Aggregator ("CCA") that 6 has been serving customers within the Pacific Gas and Electric Company ("PG&E") service 7 territory since May 7, 2010. MEA was the first, and is to date the only, operational CCA in 8 California. MEA currently provides electric service to approximately 90,000 retail customers 9 through Marin County and within the next month will being offering service to customers in the 10 City of Richmond, expanding the total number of customers served by MEA to approximately 11 120,000.¹ MEA is primarily involved in this proceeding to guarantee that its customers are not 12 negatively impacted by the proposed methodologies therein.

13 MEA customers, like Direct Access ("DA") customers, are commonly referred to as 14 "unbundled" customers because they opt to no longer receive their generation and distribution 15 electricity services from a single provider, in this case PG&E. MEA's customers receive their 16 generation services from MEA while remaining subscribed in PG&E's non-generation related 17 services. PG&E also provides consolidated billing services for MEA customers. PG&E also 18 administers certain programs for which unbundled customers are equally eligible, including 19 California Alternate Rates for Energy ("CARE), some Demand Response ("DR") programs, and 20 Energy Efficiency ("EE"); however, MEA is also authorized to act as an EE program 21 Administrator for both bundled and unbundled customers within its service territory as of the

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2013-2014 EE program cycle.² Because MEA customers receive generation and distribution 1 2 services from separate entities, shifting of costs from generation to distribution rate componen ts 3 of PG&E's bundled service can result in inequitable and anti-competitive impacts on MEA and 4 its customers.

5 In this testimony, MEA identifies three issues that adversely impact MEA's customers. 6 These issues are as follows: 1) the methodology used for allocating PG&E's overhead expenses 7 to generation and distribution rate components based upon labor factors, needs to be revised to 8 improve its competitive neutrality; 2) Customer Retention costs must remain collected below-9 the-line from PG&E shareholders; 3) the methodology for the disbursement of Department of 10 Energy ("DOE") related litigation awards must be revised, to better correlate with past spent 11 nuclear fuel storage costs and to more equitably allocate the benefits to unbundled customers 12 who contributed towards paying these costs.

13 П. MEA Proposes Revisions to PG&E Overhead Allocation Methodology to Enhance **Competitively Neutrality** 14

15 Current Overhead Allocation Methodology Assigns too Little Overhead to Α. the Generation Function 16

17 Though PG&E has not proposed to modify the methodology used to allocate 18 Administrative and Generation ("A&G") overhead costs to its Unbundled Cost Categories ("UCC")³ based upon Operations and Maintenance ("O&M") labor ratios, ⁴ MEA believes this 19 20 methodology must be revised to allocate overhead in a more competitively neutral manner. 21 Currently PG&E's GRC overhead costs are allocated to generation (i.e. Electric Generation) and

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³뀀囗ηThe뀀囗ηfive뀀囗ηmajor뀀囗ηUCCs뀀囗ηinclude:뀀囗ηElectric뀀囗ηDistribution,뀀囗ηGas뀀囗ηDistribution,뀀囗ηElectr and뀀口ŊGas뀀囗ŊTransmission뀀匠T%6的蹭凹ฦ\$PG&复建凹顶修es뀀囗Ŋnot뀀囗Ŋseek뀀囗Ŋrecovery뀀囗Ŋof뀀囗Ŋthe뀀囗ŊIa and뀀□Nlabels뀀□Nthese뀀료Q凹COs궴&G础Anterses.

1 distribution (i.e. Electric Distribution and Gas Distribution) rate components based upon the ratio of O&M labor factors attributable to each of these distinctly difference services. ⁵ Based upon the 2 3 proposed methodology in the PG&E 2014 GRC Phase 1, labor factors relating to Public Purpose 4 Programs ("PPP") would be attributed to the distribution UCCs. PPP related labor makes up 5 7.54% of PG&E's total labor costs. Whether or not PPP and its program components therein are 6 appropriately attributed to the distribution UCCs is left unaddressed by PG&E's testimony. MEA 7 believes it is improper to assign all PPP related labor costs to the distribution labor allocators 8 because it skews the allocation of PG&E overhead costs to distribution rate components and 9 inappropriately shifts costs to unbundled customers.

10

i.

PPPs are not inherently monopoly services akin to distribution

The majority of PPP labor costs are attributable to EE-related labor.⁶ According to PG&E's April 1 Response to MEA Data Request 5, \$63.5 million of the \$86.3 million in PPP labor costs are attributed to EE programs. Put another way, EE labor costs represent 5.55% of PG&E's total O&M labor costs (compared to 7.54% attributable to all PPP labor). According to this same Response the next largest program, based upon labor costs, was DR costing \$7 million (or .61% of PG&E's total O&M labor).

Provision of EE by PG&E is not a monopoly service akin to distribution. Various entities provide PPP-funded EE programs, including MEA. ⁷ PG&E's role as EE administrator should not in any way subsidize its competitive generation function. Similarly there has been no showing by PG&E that the remainder of the PPPs represented in the total PPP labor factors should be considered monopoly services akin to distribution. Including PPP labor costs in the

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1 overhead allocation would effectively subsidize the generation function because it would reduce 2 the share of overhead that would otherwise be allocated to generation. Accordingly, PG&E 3 should exclude PPP labor costs from the overhead allocation.

4 5

ii. Cross-subsidization occurs if PPP labor is included in distribution labor allocators

6 Including PPP labor factors in the distribution labor allocator will continue to shift 7 overhead costs excessively onto the distribution components of PG&E customers' bills. For 8 bundled customers who receive both generation and distribution services from PG&E, this cost 9 shifting - also known as cross-subsidization - would go largely unnoticed; however, for 10 unbundled customers, such as those who choose to receive generation services from a CCA, 11 these customers would be subsidizing PG&E bundled customers by paying a portion of the 12 generation-related overhead costs through their distribution charges, which PG&E continues to 13 collect from its unbundled customers.

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iii. It is anti-competitive to include PPP labor in the non-generation related labor allocators

16 In addition to the cross-subsidization of bundled customers' overhead by unbundled 17 customers, including PPP labor costs in the distribution portion of PG&E's UCCs creates an 18 anti-competitive environment for non-IOU Load Serving Entities ("LSE"), such as CCAs and 19 Electric Service Providers ("ESP"). By excessively allocating overhead costs to the non-20 generation rates of an IOU's service, CCAs and ESPs are forced to compete against a subsidized 21 IOU generation rate.

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B. The Overhead Allocation Methodology Should be Revised to Exclude PPP 23 Labor Factors From the Overhead Allocation

24 MEA believes by excluding PPP labor costs from the overhead allocation formula, 25 PG&E's overhead allocation would be more competitively neutral. Because PPPs is not

1 necessarily monopoly functions, PPP labor should be excluded from the overhead allocation so 2 that the competitive generation function is assigned the same share of overhead as would be the 3 case if PG&E did not administer these PPPs. Considering PG&E forecasts its A&G overhead costs to be \$1,166 million dollars, ⁸ this shift would mean \$30.7 million dollars less of overhead 4 5 costs would be collected from the distribution rate and an additional \$22.5 million dollars more would be collected through the generation rate. 9 (See Tables 1 & 2 for detailed calculations). 6 7 Though this shift would represent a small amount relative to PG&E's total overhead expenses, it 8 would make PG&E's overhead allocation methodology more competitively neutral.

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Unbundled Cost Category (UCC)	2011 Recorded Adjusted Labor ¹⁰		r ¹⁰ MEA Proposed Labor Factor Methodol	
	(\$000)	%	(\$000)	0/0
Electric Department				
EG - Power Generation - GRC EG - Energy Efficiency	271,373	23.70%	271,373	25.63%
EG - Power Generation - Non-GRC	1,865	0.16%	1,865	0.18%
ET - Network Transmission	70,905	6.19%	70,905	6.70%
ED - Electric Distribution	480,823	41.99%	410,482	38.77%
ED -Electric Distribution (w/o ED- PPP Admin)	410,482	35.85%	410,482	38.77%
ED - Public Purpose Program Administration	70,341	6.14%	<u>-</u>	N.A.
Electric Department Total	824,966	72.04%	754,625	71.27%
<u>Gas Department</u> GT - Gas Transmission and				
Storage	61,963	5.41%	61,963	5.85%
GD - Gas Distribution	258,187	22.55%	242,210	22.88%
GD -Gas Distribution (w/o ED-PPP Admin)	242,210	21.15%	242,210	22.88%
GD - Public Purpose Program Administration	15,977	1.40%	<u> </u>	N.A.
Gas Department Total	320,150	27.96%	304,173	28.73%
- PG&E Total Labor	1,145,116	100.00%	1,058,798	100.00%

Table 1: PG&E's O&M Labor Factors by UCC w/ and w/o PPP Labor

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Table 2: Changes in A&G Overhead Allocations w/o PPP Labor

	w/ PPP	Labor	w/o PPP	Labor	Change Allocati	e in ons
	(\$000)	%	(\$000)	%	Δ (\$000)	Δ %
Distribution	\$752,488	64.54%	\$718,776	61.64%	-\$33,711	- 2.89%
Generation	\$276,322	23.70%	\$298,849	25.63%	\$22,527	1.93%
Non-GRC	\$137,190	11.77%	\$148,375	12.73%	\$11,184	0.96%

\$1,166,000

A&G Overhead Allocations for 2014

Total Company 2014 A&G Overhead Expense Forecast (\$000)

2 III. Customer Retention Costs Should Continue to be Recovered from Shareholders

3 MEA agrees with the Division of Ratepayer Advocates ("DRA") that it is inappropriate for PG&E to recover Customer Retention costs from its ratepayers. ¹¹¹² MEA believes that as a 4 5 public utility and last-resort generation service provider, PG&E should be neutral to a customer's 6 choice of generation provider, and PG&E should not engage in Customer Retention activities. If 7 PG&E elects to engage in such activities, ratepayers should not have to pay the cost. Assigning 8 the recovery of Customer Retention costs, which include costs associated with discouraging 9 departure of customers from PG&E bundled service to unbundled service through providers such 10 as CCAs, to PG&E customers would effectively penalize ratepayers for exercising their right to 11 choose where they procure their generation services from. The importance of customer choice is 12 fundamental to MEA's founding beliefs and functionality. Recovering Customer Retention costs 13 from ratepayers goes fundamentally against a customers' right to choose. PG&E has been 14 previously directed by the Commission to treat Customer Retention costs in a "bellow-the-line"

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manner, such that shareholders pay 100% of these costs. ¹³ As with prior GRC cycles, PG&E
should be required to treat all Customer Retention costs as below-the-line items paid from PG&E
shareholder funds.

4 IV. A Methodology is Needed to Properly Repay the Costs Associated with the DOE
 5 Litigation Award regarding PG&E Costs due to Temporary Storage of Spent Nuclear Fuel

6 7

A. PG&E's Proposed Methodology for Returning the DOE Litigation Proceeds is Overly Simplistic and Inappropriate

8 PG&E proposes to credit its electric generation revenue requirement with funds awarded 9 to PG&E as a result of its litigation with the DOE over the federal government's failure to permanently store spent nuclear fuel created by PG&E's nuclear facilities.¹⁴¹⁵ PG&E proposes to 10 11 amortize the \$340 million in litigation proceeds over the next 3-year GRC period, thus reducing 12 upcoming generation rates rather significantly over this time period. In accordance with the 13 procedures applicable to its DOE Litigation Balancing Account, PG&E must flow through to ratepayers the settlement award, net of litigation costs.¹⁶ MEA believes PG&E's proposed 14 15 methodology is flawed for two reasons: 1) it does not properly account for the sources of the costs that these proceeds were intended to offset; and 2) it doesn't account for the timing over 16 17 which these costs were incurred.

18 19

i. DOE litigation awards should offset the costs created by the need for temporary storage of spent nuclear fuel

The costs which PG&E recovered through its litigation effort with the DOE correspond to costs incurred by PG&E while taking the necessary steps to store the spent fuel generated by both its Humboldt Bay Power Plant ("HBPP") and Diablo Canyon Power Plant ("DCPP")

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nuclear facilities.¹⁷ The total spent fuel storage costs accumulated by PG&E through the end of
2010 amounted to approximately \$266 million.¹⁸ PG&E also predicts that it will incur up to \$20
million per year in temporary storage costs for years 2011 through 2013, and the settlement with
the DOE allows for PG&E to collect up to that much using an actual cost basis.

According to PG&E's Response to MEA Data Request 4, at least \$131 million of the \$266 million is attributed to DCPP related costs, and at least \$134 million are attributed to HBPP related costs.¹⁹ While most of these costs were covered by PG&E generation customers through their generation rates, PG&E clarifies that at least \$59 million of the HBPP related costs were reimbursed by withdrawals from the HBPP Nuclear Decommissioning Trust ("NDT"). MEA assumes this withdrawal was made to compensate the generation customers that initially bore these costs.

12 In addition to deducting litigation expenses from the settlement proceeds prior to passing 13 through benefit to its ratepayers, MEA believes PG&E should also offset this withdrawal it made 14 from the HBPP NDT before passing through the award to generation customers. Based upon 15 PG&E's April 8, 2013 Notice of *Ex Parte* Communication with Administrative Law Judge 16 Thomas Pulsifer, it appears that PG&E is revising its DOE litigation credit methodology to 17 something close to this effect. The *Ex Parte* notice reads: "PG&E's modified proposal is to credit 18 the portion of the proceeds relating to the Humboldt Bay facility to the Nuclear 19 Decommissioning Adjustment Mechanism (NDAM) thereby reducing the NDAM rate." PG&E 20 has yet to provide more information regarding this 'modified proposal'.

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- *ii. The methodology for returning DOE litigation funds to generation customers must also account for the timing of when customers paid these costs*
- 3 MEA is concerned that PG&E's proposal to return the DOE litigation proceeds as a flat 4 reduction to generation rates will not properly account for the timing of when generation 5 customers contributed towards these costs. The standard licensing agreement that PG&E has 6 signed with the DOE for its nuclear facilities provides that the DOE would have a permanent repository for spent nuclear fuel as of January 31, 1998. ²⁰ The DOE has yet to establish such a 7 8 repository, thus the costs that PG&E is seeking to recover through this litigation have been 9 accumulating for over 15 years now. 10 Since PG&E has been recovering these temporary storage costs through its generation

11 rate, PG&E's bundled generation customers have been paying these costs over the entirety of 12 that 15-year time period. Since 1998, many customers have departed from PG&E's generation 13 services either initially due to DA or more recently due to CCA. Customers that have more 14 recently departed from PG&E's generation service should still be eligible to receive a share of 15 the litigation credit that corresponds to their past contributions as a bundled generation customer. 16 MEA believes that a vintaged return methodology of DOE litigation credits should be devised so 17 that unbundled customers, who previously contributed to these costs while subscribing to 18 bundled service, are also fairly compensated.

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B. DOE Litigation Proceeds Should be Returned Through a Vintaged Credit Methodology Similar to the Power Charge Indifference Adjustment Methodology

21 MEA suggests that PG&E develop a vintaged methodology to return DOE litigation 22 credits to generation customers based upon the years during which these customers contributed 23 towards these temporary spent fuel storage costs. Similar to the vintaging methodology already

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employed by PG&E for the Power Charge Indifference Adjustment ("PCIA"), ²¹ PG&E could 1 2 leverage this same vintaging system, to assign credits to current and previous bundled generation 3 customers based upon their contributions to these temporary storage costs over the period during 4 which these costs were recovered (1998 through present). These credits could either be based on 5 an actual annual cost basis corresponding with the collections taken from generation customers 6 each year since 1998, or these credits could be allocated using an average annual cost basis 7 derived by dividing the total collected costs by the total collection period. MEA, at this time, 8 does not have a preference on how these credit values are determined provided they are passed 9 through on a fair, vintaged basis to current and previous bundled generation customers. 10 However, MEA proposes the following methodology for refunding the DOE refunds on a 11 vintaged basis to reflect the inter-temporal payment of the storage costs by bundled and formerly 12 bundled customers, which MEA believes would be most fair and straightforward. The DOE 13 refunds would first be allocated to each year, starting with 1998, in proportion to the temporary 14 storage costs recovered in generation rates. A per KWh credit would be calculated for each year by dividing the allocated DOE refund by the total PG&E kWh sales (bundled and unbundled) for 15 16 that year. The credits would be applied to unbundled customers on a vintaged basis, established 17 by the date of departure from bundled service, using the same vintaging criteria as used for 18 application of the PCIA. An unbundled customer would receive credits associated with all of the 19 years prior to the vintaged departure date because it would have paid all of the storage costs 20 during those years as a bundled customer. For example, a customer departing in May of 2013

²¹ 뀀□ŊThe뀀□ŊPCIA뀀□Ŋis뀀□Ŋa뀀□Ŋvintaged뀀□Ŋfee뀀□Ŋapplied뀀□Ŋto뀀□Ŋdeparting뀀□Ŋload뀀□Ŋcustomers뀀[associated뀀□Ŋwith뀀□Ŋpower뀀□ŊcontradtesA翻□Ŋpy础oApe6鍵IIIOppioPe6鍵IIIOppioPm。 each뀀□Ŋcustomer뀀□Ŋthat뀀□Ŋdeparts뀀□ŊPG&E's뀀□Ŋbundled뀀□Ŋservice뀀□Ŋreceives뀀□Ŋa뀀□Ŋvintage뀀□Ŋy leave.뀀□ŊPG&E뀀□Ŋthen뀀□Ŋdetermines뀀□Ŋan뀀□Ŋaverage뀀□Ŋabove뀀□t胐@IKitIIIONttage뀀□Ŋthrough뀀□Ŋintage뀀□Ŋ these뀀□Ŋdeparting뀀□Ŋload뀀□Ŋcustomers뀀□Ŋwith뀀□Ŋthe뀀□Ŋappropriate뀀□Ŋvintage뀀□Ŋvintage뀀□Ŋfixed뀀 proposal뀀□Ŋhere,뀀□ŊPG&E뀀□Ŋalready뀀□Ŋkeeps뀀□Ŋa뀀□Ŋdatabase뀀□Ŋof뀀□Ŋdeparti剛如□Ŋload뀀□Ŋcustom

would receive a 2012 vintaged credit that would equal the sum of each of the annual per kWh credits from 1998 through 2012. This vintaged credit would be applied to the customer's bill for a one-year period. Bundled customers would receive the credit through a reduction in generation rates for their share of the DOE refund. The bundled customer share would be determined by adding the annual per KWh credits for all years and applying this total credit based on bundled customer KWh sales. The bundled customer credit could be returned over three years as proposed by PG&E.

8 V. Conclusion

9 MEA believes PG&E's proposals for the 2014 General Rate Case should be modified in 10 three ways to improve the competitive neutrality of the overall Application. (i) PG&E should 11 exclude PPP labor factors from the allocation of A&G overhead expenditures so that overhead 12 expenditures are allocated in a more competitively neutral manner. (ii) PG&E should continue to 13 recover Customer Retention costs below-the-line from its Shareholders. (iii) PG&E should return 14 DOE litigation proceeds corresponding to temporary spent nuclear fuel costs through a vintaged 15 approach that accounts for contributing ratepayers that have since left PG&E's bundled services. 16 MEA believes that all three of these recommendations are reasonable and easily actionable. 17 Furthermore, all three of these recommendations would allow PG&E to implement its 2014 GRC 18 Phase 1 in a considerably more competitively neutral manner than initially proposed.

12

Attachment 1:

MEA Data Request 4 and Corresponding PG&E Responses

A.12-11-009 PG&E 2014 General Rate Case Marin Energy Authority Data Request 4 March 13, 2013

Date for Objections: March 20, 2013 Response Due Date: March 27, 2013

TO: Steven W. Frank Law Department Pacific Gas and Electric Company Post Office Box 7442 San Francisco, California 94120 Telephone: (415) 973-6976 <u>SWF5@pge.com</u> and GRC 2014 Mailbox <u>GRC2014Mailbox@pge.com</u>

FROM: Jeremy Waen Regulatory Analyst Marin Energy Authority 781 Lincoln Avenue, Suite 320 San Rafael, CA 94901 Office: (415) 464-6027 jwaen@marinenergy.com Elizabeth Kelly Legal Director Marin Energy Authority 781 Lincoln Avenue, Suite 320 San Rafael, CA 94901 Office: (415) 464-6022 ekelly@marinenergy.com

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Follow-up Regarding Exhibit PG&E-6 Chapters 3 and 6 Energy Supply Ratemaking

The following questions are in regard to PG&E's litigation with the Department of Energy (DOE) detailed in both Chapters 3 and 6 of PG&E Exhibit 6.

- 1. Please briefly explain the mechanics of the DOE charge (for permanent storage of spent nuclear fuel) and what caused the resulting litigation. For example, were the DOE funds collected by PG&E held until DOE was to receive the spent nuclear fuel? Or was this a pass-through to DOE?
- 2. What was the total dollar amount collected via this DOE charge for permanent storage of spent nuclear fuel from ratepayers for each year since the charge was first collected from ratepayers?
- 3. During this period of time (i.e. the scope of PG&E's litigation), what were the costs incurred by PG&E related to this litigation?
 - a. What were the total legal costs incurred by PG&E relating to this litigation?

- b. What were the storage costs for spent nuclear fuel that were incurred by PG&E due the DOE's failure to take the spent nuclear fuel?
- c. What were the Independent Spent Fuel Storage Installation (ISFSI) costs incurred due the DOE failing to transfer and permanently store PG&E's spent nuclear fuel? Are there other costs included in the ISFSI?
- d. Are there other relevant costs that PG&E incurred?
- 4. Please explain where the costs outlined in Question 3 were recovered from (i.e. the source of funds, such as a balancing account) and whether those costs/sources of funds were from generation or distribution ratepayers, or some other source. For example, from which ratepayers are ISFSI related costs recovered?
- 5. Please explain the relationship between the funds held in Nuclear Decommissioning Trust, funds spent on ISFSI, and the funds collected for DOE permanent storage costs.

END OF REQUEST

INSTRUCTIONS

The following General Instructions apply to each data request:

- 1. In response to each data request, provide all relevant and responsive information reasonably available to the Pacific Gas & Electric Company ("PG&E").
- 2. If any of the information sought in a data request will not be available by the response date for that request, state the projected date on which such information will become available.
- 3. Each written response or objection should designate the specific data request and data request item under which it is being provided.
- 4. Identify each person who provided information used in answering each data request. Such information shall include the full name, occupation, title, employer and organization for each such person, and indicate the information provided by each.
- 5. Please include in your production all exhibits appended to or referenced in the requested analyses, testimony, discovery or presentation.

6. Thank you.

PG&E Data Request No .:	MEA_004-01		
PG&E File Name:	GRC2014-Ph-I_DR_MEA_004-	Q01	
Request Date:	March 13, 2013	Requester DR No.:	004
Date Sent:	March 15, 2013	Requesting Party:	Marin Energy Authority
PG&E Witness:	Joseph O'Flanagan	Requester:	Jeremy Waen

SUBJECT: FOLLOW-UP REGARDING EXHIBIT PG&E-6 CHAPTERS 3 AND 6 ENERGY SUPPLY RATEMAKING

QUESTION 1

Please briefly explain the mechanics of the DOE charge (for permanent storage of spent nuclear fuel) and what caused the resulting litigation. For example, were the DOE funds collected by PG&E held until DOE was to receive the spent nuclear fuel? Or was this a pass-through to DOE?

ANSWER 1

The DOE charge as specified in PG&E's spent fuel contracts was 1 mill (one tenth of one cent)/kW-hour. It was derived based upon the kilowatt-hour production at PG&E's nuclear power plants and included in the costs recovered from customers in the generation portion of PG&E's revenue requirement. The funds collected were remitted to DOE periodically on an as-collected basis; the funds were not held by PG&E.

PG&E Data Request No .:	MEA_004-02		
PG&E File Name:	GRC2014-Ph-I_DR_MEA_004-	Q02	
Request Date:	March 13, 2013	Requester DR No.:	004
Date Sent:	March 15, 2013	Requesting Party:	Marin Energy Authority
PG&E Witness:	Joseph O'Flanagan	Requester:	Jeremy Waen

SUBJECT: FOLLOW-UP REGARDING EXHIBIT PG&E-6 CHAPTERS 3 AND 6 ENERGY SUPPLY RATEMAKING

QUESTION 2

What was the total dollar amount collected via this DOE charge for permanent storage of spent nuclear fuel from ratepayers for each year since the charge was first collected from ratepayers?

ANSWER 2

As of 3/15/2013 PG&E has remitted \$426,620,545.56 to DOE for their Nuclear Waste Fund. See Attachment GRC2014-Ph-I_DR_MEA_004-Q04Atch01 for details.

GRC2014-Ph-I_DR_MEA_004-Q02Atch01



Department of Energy

Consolidated Accounting & Investment System

Detail History Report Nuclear Waste Fund Reporting 4/1/1983 thru 3/15/2013 Total Received for NE44402 : 426,620,545.56

Print Date: 3/15/2013 7:18:39 AM

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Department of Energy

Consolidated Accounting & Investment System

Detail History Report Nuclear Waste Fund

Reporting 4/1/1983 thru 3/15/2013

Company Name/Address		AKA	Con	tract Number	
Pacific Gas and Electric Company		<u></u>	NE4	14402	******
Mail Code 104/6/6					
P.O. Box 56					
Anile Density CA 07424					
Avita Beach, CA 93424					
Reator name		Reactor Number	Stati	ion	Total Received
Diablo Canyon 1		3501	Diat	olo Canyon	211,734,329.18
		C	Collections Detail		
CashDate	Adj	Transtype(CashType)	BackDate	Amount	
2/28/1985		KWH Receipt (Wire Receipt - Receivable)		287,400,00	
5/30/1985		KWH Receipt (Wire Receipt - Receivable)		769,413.00	
8/30/1985		KWH Receipt (Wire Receipt - Receivable)		2,160,556.00	
11/29/1985		KWH Receipt (Wire Receipt - Receivable)		2,228,831.00	
2/28/1986		KWH Receipt (Wire Receipt - Receivable)		1,844,776.00	
5/30/1986		KWH Receipt (Wire Receipt - Receivable)		2,114,781.00	
8/29/1986		KWH Receipt (Wire Receipt - Receivable)		2,053,112.00	
11/28/1986		KWH Receipt (Wire Receipt - Receivable)		381,705.00	
2/27/1987		KWH Receipt (Wire Receipt - Receivable)		309,463.00	
5/29/1987		KWH Receipt (Wire Receipt - Receivable)		2,167,660.00	
8/31/1987		KWH Receipt (Wire Receipt - Receivable)		2,237,430.00	
11/30/1987		KWH Receipt (Wire Receipt - Receivable)		2,227,706.00	
2/29/1988		KWH Receipt (Wire Receipt - Receivable)		1,974,485.00	
5/31/1988		KWH Receipt (Wire Receipt - Receivable)		621,952.00	
8/31/1988		KWH Receipt (Wire Receipt - Receivable)		242,544.00	
11/30/1988		KWH Receipt (Wire Receipt - Receivable)		2,210,547.00	
2/23/1989		KWH Receipt (Wire Receipt - Receivable)		2,305,767.00	
5/31/1989		KWH Receipt (Wire Receipt - Receivable)		2,173,568.00	
8/31/1989		KWH Receipt (Wire Receipt - Receivable)		2,345,257.00	
11/30/1989		KWH Receipt (Wire Receipt - Receivable)		1,680,727.00	
2/28/1990		KWH Receipt (Wire Receipt - Receivable)		1,015,703.00	
5/31/1990		KWH Receipt (Wire Receipt - Receivable)		2,218,282.00	
8/31/1990		KWH Receipt (Wire Receipt - Receivable)		2,053,484,00	
11/30/1990		KWH Receipt (Wire Receipt - Receivable)		2,334,488.00	
3/4/1991		KWH Receipt (Wire Receipt - Receivable)		2,082,497.00	
5/31/1991		KWH Receipt (Wire Receipt - Receivable)		499,517.00	
8/30/1991		KWH Receipt (Wire Receipt - Receivable)	•	2,270,845.00	
11/29/1991		KWH Receipt (Wire Receipt - Receivable)		2,330,992.00	
2/28/1992		KWH Receipt (Wire Receipt - Receivable)		2,082,893.00	
5/29/1992		KWH Receipt (Wire Receipt - Receivable)		1,957,790.74	
8/31/1992		KWH Receipt (Wire Receipt - Receivable)		2,137,828.00	
11/30/1992		KWH Receipt (Wire Receipt - Receivable)		932,436.00	
Print Date: 3/15/2013	7:18:39 AM				Page 5 of 18

GRC2014-Ph-I_DR_MEA_004-Q02Atch01

Detail History Report Nuclear Waste Fund

Reporting 4/1/1983 thru 3/15/2013 1,851,174.00

1,977,345.00

2,110,468.00

2,141,587.00

1,964,233.00

927,494.00

1,603,051.00

2,210,581.00

2,056,797.00

2.053.329.00

2.161.712.00

1,116.35 -25,383.23

-83,324.03

-443,107,94

-186,495.21

-349,266,48

-224,694.18

-345,530,00

-306.358.82

-1,271,684,33

-1,969,843.86

-357,497.98

-37,457.01

-138.00

-6.00

502,51

1,329,230.00

1,225,516.00

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2,099,188.00

2,036,198.00

1,966,831.00

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1,336,349.00

2,136,333.00

2,141,179.00

2,086,785.00

2,148,509.00

2,060,002,00

1,896,299,00

1,239,481.00

2,310,863.00

2,136,156.04

2,214,696.15

2,087,636.66

36,723,00

Consolidated Accountin	g & Investment System	
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Department of Energy

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Reporting 4/1/1983 thru 3/15/2013

Consolidated Acco	ounting & Investment System	l
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579.31	
1,586,970.67	
1,581,115.87	
613,277.72	
1,688,216.58	
2,350,890.97	
2,373,172.94	
2,259,481,25	
2,116,201.14	
1,395,080.31	
1,852,549.95	
1,173,834.63	
88,101.24	
17,829.42	
17,838.79	
2,309,936.71	
17,441.82	
2,334,029.27	
2,386,296.98	
17,838.79	
17,838.79	
2,315,678.16	
17,644,88	
19,917.12	
1,091,477.96	
1,100,133.85	
2,247,569.61	
2,221,970.20	
2,214,748.16	
2,339,959.47	
2,085,952.21	
1,490,146.19	
2,330,328.53	
2,405,956.64	
2,401,577.71	
2,348,719.66	
2,269,980.50	
1,582,479.73	
2,165,274.04	
2,318,563.93	
2,333,973.45	
2,332,549.00	
2,351,919.98	
2,192,569.60	
890,710.57	
2,397,101.58	
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8/31/2009
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8/31/2000

Department of Energy

Detail History Report Nuclear Waste Fund

Reporting 4/1/1983 thru 3/15/2013

	2,213,335.54
2/28/2010	2,331,103.64
	- 2,277,884,60
	2,421,056,19
	1,638,861.89
	2,030,050.21
	2,293,641,36
	2,378,068.40
	2,268,626.08
	2,380,678,78
	2,136,104.85
	1,114,270.74
	2,436,918,27
	2,323,452,54

Department of Energy Consolidated Accounting & Investment System

12/2/2009 3/1/2010 5/28/2010 9/1/2010 1/30/2010 2/28/2011 5/31/2011 1/30/2011 2/29/2012 5/31/2012 8/31/2012 1/1/30/2012 2/28/2013

KWH Receipt (Wire Receipt - Receivable) KWH Receipt (Wire Receipt - Receivable)

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Company Name/Address

Department of Energy

Consolidated Accounting & Investment System

AKA

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Detail History Report

Nuclear Waste Fund

Reporting 4/1/1983 thru 3/15/2013

Contract Number

Pacific Gas and Electric Company				NE44402	
Mail Code 104/6/6					
P.O. Box 56					
Avila Beach, CA 93424					
Reator name		Reactor Number		Station	Total Received
Diable Canvon 2	******	3502		Diablo Canvon	209.741.875.49
			N 11		
-		Ĺ	collections Detail		
CashDate	Adj	Transtype(CashType)	BackDate	Amount	
2/28/2013		KWH Receipt (Wire Receipt - Receivable)		2,327,279.79	
11/30/2012		KWH Receipt (Wire Receipt - Receivable)		2,259,090.81	
8/31/2012		KWH Receipt (Wire Receipt - Receivable)		2,426,874.51	
5/31/2012		KWH Receipt (Wire Receipt - Receivable)		2,152,534.46	
2/29/2012		KWH Receipt (Wire Receipt - Receivable)		2,351,029,30	
11/30/2011		KWH Receipt (Wire Receipt - Receivable)		2,337,518.68	
8/31/2011		KWH Receipt (Wire Receipt - Receivable)		1,394,479.66	
5/31/2011		KWH Receipt (Wire Receipt - Receivable)		2,126,403,14	
2/28/2011		KWH Receipt (Wire Receipt - Receivable)		2,322,771.74	
11/30/2010		KWH Receipt (Wire Receipt - Receivable)		2,369,522,44	
9/1/2010		KWH Receipt (Wire Receipt - Receivable)		2,413,286.84	
5/28/2010		KWH Receipt (Wire Receipt - Receivable)		2,329,215,96	
3/1/2010		KWH Receipt (Wire Receipt - Receivable)	2/28/2010	2,025,674.04	
12/2/2009		KWH Receipt (Wire Receipt - Receivable)		1,221,157.95	
8/31/2009		KWH Receipt (Wire Receipt - Receivable)		2,231,946.87	
5/29/2009		KWH Receipt (Wire Receipt - Receivable)		2,295,920.97	
2/27/2009		KWH Receipt (Wire Receipt - Receivable)		2,363,038.47	
11/28/2008		KWH Receipt (Wire Receipt - Receivable)		1,682,494.44	
8/29/2008		KWH Receipt (Wire Receipt - Receivable)		2,384,684,21	
5/30/2008		KWH Receipt (Wire Receipt - Receivable)		459,588.36	
2/29/2008		KWH Receipt (Wire Receipt - Receivable)		2,252,674.20	
11/30/2007		KWH Receipt (Wire Receipt - Receivable)		2,335,028.84	
8/31/2007		KWH Receipt (Wire Receipt - Receivable)		2,347,896.93	
5/31/2007		KWH Receipt (Wire Receipt - Receivable)		2,230,458.70	
2/28/2007		KWH Receipt (Wire Receipt - Receivable)		2,224,463.67	
11/30/2006		KWH Receipt (Wire Receipt - Receivable)		2,393,703.83	
8/31/2006		KWH Receipt (Wire Receipt - Receivable)		1,677,002.87	
5/31/2006		KWH Receipt (Wire Receipt - Receivable)		1,868,220.65	
2/28/2006		KWH Receipt (Wire Receipt - Receivable)		2,312,666.27	
11/30/2005		KWH Receipt (Wire Receipt - Receivable)		2,228,854.27	
8/31/2005		KWH Receipt (Wire Receipt - Receivable)		2,357,614.25	
5/31/2005		KWH Receipt (Wire Receipt - Receivable)		2,277,356.74	
2/28/2005		KWH Receipt (Wire Receipt - Receivable)		1,060,172.57	
11/30/2004		KWH Receipt (Wire Receipt - Receivable)		2,009,035.03	
Print Date: 3/15/2013 7	:18:39 AM				Page 9 of 18



Detail History Report Nuclear Waste Fund

Reporting 4/1/1983 thru 3/15/2013 2,174,977.51

2,141,983.95

19,136.05

16.952.93

17,139,22

17,139.22 2,374,282.98

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17,139.22

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84,737.05 2.123.707.97

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Consolidated Accounting & Investment System

Department of Energy

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2/29/1988	

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Detail History Report Nuclear Waste Fund

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-274,858.00

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-186,366,24

-413,896.91

-64,425.11

-342,318.25

-986.50

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2,137,532.00

2,093,143.00

1,863,613.00

1,313,843.00

2,229,383.00

1,792,636.00

2,122,390.00

2,195,947.00

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698,297.00

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2,206,551.00

1,983,659.21

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2,154,343,00

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1,922,426.00

2,217,651.00

2,120,351.00

-33,605,56

26,103.00

509.15

Reporting 4/1/1983 thru 3/15/2013

Consolidated Accountin	g & Investment System	x
	KWH Receipt (Wire, Gross/Net - Receivabl	
	KWH Receipt (Wire Receipt - Receivable)	
	KWH Receipt (Wire Receipt - Receivable)	8/31/1988
	KWH Receipt (Wire Receipt - Receivable)	5/29/1992
	KWH Receipt (Wire Receipt - Receivable)	
	KWH Payment (Credit, Gen/Sold - Payable)	
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Department of Energy

11/30/1987 2/29/1996 2/28/1989 8/31/1994 11/30/1995 11/30/1994 11/30/1993 11/30/1992 8/31/1992 8/29/1986 11/30/1994 11/30/1993 8/31/1992 11/30/1992 8/31/1988 6/19/1991 8/31/1995 5/31/1995 2/28/1995 11/30/1994 8/31/1994 5/31/1994 2/28/1994 11/30/1993 8/31/1993 5/28/1993 2/26/1993 11/30/1992 8/31/1992 5/29/1992 2/28/1992 11/29/1991 8/30/1991 5/31/1991 3/4/1991 11/30/1990 8/31/1990 5/31/1990 2/28/1990 11/30/1989 8/31/1989 5/31/1989 2/28/1989 11/30/1988 8/31/1988 5/31/1988 2/29/1988

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Department of Energy

Consolidated Accounting & Investment System

11/30/1987 \$/31/1987 5/29/1987 2/27/1987 11/28/1986 \$/29/1986 5/30/1986 2/28/1986 11/29/1985 KWH Receipt (Wire Receipt - Receivable) KWH Receipt (Wire Receipt - Receivable)

Detail History Report

Nuclear Waste Fund

Reporting 4/1/1983 thru 3/15/2013

2,359,127.00 171,387.00 1,103,914.00 2,243,487.00 2,119,691.00 1,856,974.00 1,331,873.00 678,030.00 50,900.00

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Detail History Report Nuclear Waste Fund

Reporting 4/1/1983 thru 3/15/2013

573,954.47

15,777.47

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Department of Energy

Consolidated Accounting & Investment System

SNF Interest Receipt (Wire Receipt - Rec

SNF Interest Receipt (Wire Receipt - Rec

Company Name/Address AKA Contract Number NE44402 Pacific Gas and Electric Company Mail Code 104/6/6 P.O. Box 56 Avila Beach, CA 93424 Reactor Number Reator name Station Total Received Humboldt Bay 3503 Humbolt Bay 5,144,340.89 Collections Detail CashDate Adj Transtype(CashType) BackDate Amount 6/27/1985 SNF Principal Receip (Wire Receipt - Rec 3,887,152.32 6/28/1996 SNF Principal Receip (Wire Receipt - Rec 667,456.63

Print Date: 3/15/2013 7:18:39 AM

6/28/1996

8/30/1996

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PG&E Data Request No .:	MEA_004-03		
PG&E File Name:	GRC2014-Ph-I_DR_MEA_004-	Q03	
Request Date:	March 13, 2013	Requester DR No.:	004
Date Sent:	March 15, 2013	Requesting Party:	Marin Energy Authority
PG&E Witness:	Joseph O'Flanagan	Requester:	Jeremy Waen

SUBJECT: FOLLOW-UP REGARDING EXHIBIT PG&E-6 CHAPTERS 3 AND 6 ENERGY SUPPLY RATEMAKING

QUESTION 3

During this period of time (i.e. the scope of PG&E's litigation), what were the costs incurred by PG&E related to this litigation?

- a. What were the total legal costs incurred by PG&E relating to this litigation?
- b. What were the storage costs for spent nuclear fuel that were incurred by PG&E due the DOE's failure to take the spent nuclear fuel?
- c. What were the Independent Spent Fuel Storage Installation (ISFSI) costs incurred due the DOE failing to transfer and permanently store PG&E's spent nuclear fuel? Are there other costs included in the ISFSI?
- d. Are there other relevant costs that PG&E incurred?

ANSWER 3

- a. The Department of Energy Litigation Balancing Account (DOELBA) balance for outside counsel and litigation expense as of 2/28/2013 is \$14.958 million.
- b. The following table is a summary of the costs used to determine the settlement amount of \$266,104,245:

Claim Area		
	Set	tlement Amount
DCPP ISFSI	\$	122,109,083
DCPP Temp Rack	\$	7,424,854
DCPP Pre-1998 Study	\$	1,451,091
HBPP SAFSTOR	\$	74,884,657
HBPP ISFSI	\$	59,335,043
Off-Site Storage Study	\$	899,517
Total	\$	266,104,245

- c. See the answer to subpart b.
- d. All of the reimbursable costs included in the settlement are shown in the response to subpart b.

PG&E Data Request No .:	MEA_004-04		
PG&E File Name:	GRC2014-Ph-I_DR_MEA_004-	Q04	
Request Date:	March 13, 2013	Requester DR No.:	004
Date Sent:	March 15, 2013	Requesting Party:	Marin Energy Authority
PG&E Witness:	Joseph O'Flanagan	Requester:	Jeremy Waen

SUBJECT: FOLLOW-UP REGARDING EXHIBIT PG&E-6 CHAPTERS 3 AND 6 ENERGY SUPPLY RATEMAKING

QUESTION 4

Please explain where the costs outlined in Question 3 were recovered from (i.e. the source of funds, such as a balancing account) and whether those costs/sources of funds were from generation or distribution ratepayers, or some other source. For example, from which ratepayers are ISFSI related costs recovered?

ANSWER 4

The costs associated with Diablo Canyon were recovered from customers as part of the generation component of PG&E's revenue requirement. The costs associated with HBPP SAFESTOR were recovered from customers as a surcharge in the nuclear decommissioning component of PG&E's revenue requirement. The costs associated with the HBPP ISFSI were reimbursed through draw-downs from the HBPP Decommissioning Trust (which was funded through the nuclear decommissioning component of PG&E's revenue requirement).

PG&E Data Request No .:	MEA_004-05		
PG&E File Name:	GRC2014-Ph-I_DR_MEA_004-	Q05	
Request Date:	March 13, 2013	Requester DR No.:	004
Date Sent:	March 15, 2013	Requesting Party:	Marin Energy Authority
PG&E Witness:	Joseph O'Flanagan	Requester:	Jeremy Waen

SUBJECT: FOLLOW-UP REGARDING EXHIBIT PG&E-6 CHAPTERS 3 AND 6 ENERGY SUPPLY RATEMAKING

QUESTION 5

Please explain the relationship between the funds held in Nuclear Decommissioning Trust, funds spent on ISFSI, and the funds collected for DOE permanent storage costs.

ANSWER 5

As discussed in the responses to questions 1 and 4 (GRC2014-Ph-I_DR_MEA_004-Q01, Q04), the funds collected by DOE under the spent fuel contracts were recovered from generation customers and are unrelated to the Nuclear Decommissioning Trust Fund. The funds spent on the Diablo Canyon ISFSI were recovered from generation customers and are unrelated to the Nuclear Decommissioning Trust. The funds spent on the HBPP ISFSI were reimbursed through withdrawals from the HBPP Nuclear Decommissioning Trust.

Attachment 2:

MEA Data Request 5 and Corresponding PG&E Responses

A.12-11-009 PG&E 2014 General Rate Case Marin Energy Authority Data Request 5 March 19, 2013

Date for Objections: March 26, 2013 Response Due Date: April 2, 2013

TO: Steven W. Frank Law Department Pacific Gas and Electric Company Post Office Box 7442 San Francisco, California 94120 Telephone: (415) 973-6976 <u>SWF5@pge.com</u> and GRC 2014 Mailbox <u>GRC2014Mailbox@pge.com</u>

FROM: Jeremy Waen Regulatory Analyst Marin Energy Authority 781 Lincoln Avenue, Suite 320 San Rafael, CA 94901 Office: (415) 464-6027 jwaen@marinenergy.com Elizabeth Kelly Legal Director Marin Energy Authority 781 Lincoln Avenue, Suite 320 San Rafael, CA 94901 Office: (415) 464-6022 <u>ekelly@marinenergy.com</u>

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Follow-up Regarding Exhibit PG&E-2 Work Paper 7-11

The following questions are in regard to the table titled "O&M Labor Factors by UCC" and the contents within it.

- 1. For the line items labeled ED Public Purpose Program Administration (line 16) and GD Public Purpose Program Administration (line 24), what are all the programs funded by the PPP charges (e.g. CARE, EE, CSI, etc.)?
 - a. Please provide a delineation of the labor allocators for each of these subprograms as a percentage of the overall PG&E total labor in the answer to the above question.
 - b. For the Energy Efficiency components funded by PPP charges, please provide a delineation of the labor allocators for each of the various EE sub-programs as a percentage of the overall PG&E total labor in the answer to the above question.

END OF REQUEST

INSTRUCTIONS

The following General Instructions apply to each data request:

- 1. In response to each data request, provide all relevant and responsive information reasonably available to the Pacific Gas & Electric Company ("PG&E").
- 2. If any of the information sought in a data request will not be available by the response date for that request, state the projected date on which such information will become available.
- 3. Each written response or objection should designate the specific data request and data request item under which it is being provided.
- 4. Identify each person who provided information used in answering each data request. Such information shall include the full name, occupation, title, employer and organization for each such person, and indicate the information provided by each.
- 5. Please include in your production all exhibits appended to or referenced in the requested analyses, testimony, discovery or presentation.

6. Thank you.

PG&E Data Request No .:	MEA_005-01		
PG&E File Name:	GRC2014-Ph-I_DR_MEA_005-	Q01	
Request Date:	March 19, 2013	Requester DR No.:	005
Date Sent:	April 1, 2013	Requesting Party:	Marin Energy Authority
PG&E Witness:	David H. Hartman	Requester:	Jeremy Waen

SUBJECT: FOLLOW-UP REGARDING EXHIBIT PG&E-2 WORK PAPER 7-11

QUESTION 1

For the line items labeled ED – Public Purpose Program Administration (line 16) and GD – Public Purpose Program Administration (line 24), what are all the programs funded by the PPP charges (e.g. CARE, EE, CSI, etc.)?

- a. Please provide a delineation of the labor allocators for each of these subprograms as a percentage of the overall PG&E total labor in the answer to the above question.
- b. For the Energy Efficiency components funded by PPP charges, please provide a delineation of the labor allocators for each of the various EE sub-programs as a percentage of the overall PG&E total labor in the answer to the above question.

ANSWER 1

a. The following table shows the programs that were included in the ED and GD PPP lines of the O&M Labor Allocation Table (WP7-11, line 16 and 24).

Program	2011 Labor (\$000)	% of Total Labor
Customer Energy Efficiency MWCs	63,500	5.55%
LIBA-Low Income (Public Purpose Program)	6,679	0.58%
CARE - Calif. Altern. Rate for Energy	2,748	0.24%
FERA - Family Elect. Rate Assistance	101	0.01%
CSIBA - California Solar Initiative Bal.	3,095	0.27%
CSITPMA - CSI Therm Gas Memo Account	472	0.04%
SGIP - Self Generation Incentive Program	417	0.04%
Demand Response Other	58	0.01%
DREBA - Demand Response Expenditures	7,021	0.61%
ACEBA - Air Conditioning Expenditures	727	0.06%
10/20 Program - Gas 10/20 Program	815	0.07%
Other	685	0.06%
Total	86,318	7.54%

Page 1

b. The delineation of sub-programs of Customer Energy Efficiency MWCs appears in attachment GRC2014-Ph-I_DR_MEA_005-Q01Atch01.

Labor Allocators for EE Programs

program number	program name	Total (\$)	Percentage allocator
EM&V	Evaluation, Measurement & Verification	804,567	0.07%
PGE21001	Home Energy Efficiency Surveys Program	1,079,166	0.09%
PGE21002	Residential Lighting Incentive Program	684,165	0.06%
PGE21003	Advanced Consumer Lighting Program	427,303	0.04%
PGE21004	Home Energy Efficiency Rebates	2,277,578	0.20%
PGE21005	Appliance Recycling Program	553,493	0.05%
PGE21006	Business and Consumer Electronics Progra	941,091	0.08%
PGE21007	Multifamily Energy Efficiency Rebates Pr	448,873	0.04%
PGE21008	Whole House Performance Program (1)	961,345	0.08%
PGE21011	Calculated Incentives	5,585,340	0.49%
PGE21012	Deemed Incentives	4,956,091	0.43%
PGE21013	Continuous Energy Improvement	188,450	0.02%
PGE21014	Nonresidential Audits Program	1,292,705	0.11%
PGE21021	Calculated Incentives	3,607,701	0.32%
PGE21022	Deemed Incentives	1,521,195	0.13%
PGE21023	Continuous Energy Improvement	359,875	0.03%
PGE21024	Nonresidential Audits Program	90,149	0.01%
PGE21031	Calculated Incentives	3,027,549	0.26%
PGE21032	Deemed Incentives	1,381,582	0.12%
PGE21033	Continuous Energy Improvement	251,974	0.02%
PGE21034	Nonresidential Audits Program	90,149	0.01%
PGE21035	Pump Efficiency Services Program	290,870	0.03%
PGE21041	Residential New Construction	1,499,909	0.13%
PGE21042	Savings By Design	3,157,344	0.28%
PGE2105	Lighting Market Transformation	140,322	0.01%
PGE21061	Upstream HVAC Equipment Incentive	412,755	0.04%
PGE21062	HVAC Technologies and System Diagnostics	135,656	0.01%
PGE21063	Commercial Quality Installation	320,276	0.03%
PGE21064	ENERGY STAR Residential Quality Installa	594,946	0.05%
PGE21065	Residential Quality Maintenance and Comm	1,002,959	0.09%
PGE21066	Workforce Education & Training	140,572	0.01%
PGE21071	C&S Advocacy & CASE Studies: Building C	259,558	0.02%
PGE21072	C&S Advocacy & CASE Studies: Appliance S	312,248	0.03%
PGE21073	C&S Compliance Enhancements Training	61,532	0.01%
PGE21074	C&S Coordination (Statewide, EE Programs	92,285	0.01%
PGE21075	C&S REACH Codes	127,702	0.01%
PGE21076	C&S Other	17,970	0.00%
PGE21081	Assessments	1,174,104	0.10%
PGE21082	Scaled Field Placement	6,732	0.00%
PGE21083	Demonstration / Showcasing	6,732	0.00%
PGE21084	Market and Behavioral Studies	26,955	0.00%
PGE21085	Technology Supply Side Efforts	36,959	0.00%
PGE21086	Incubation	7,240	0.00%
PGE21091	WE&T Centergies	1,962,199	0.17%
PGE21092	WE&T Connections	183,456	0.02%
PGE21093	WE&T Strategic Plan Implementation	39,792	0.00%

PGE21101	Statewide Marketing & Outreach	151,333	0.01%
PGE2111	Statewide DSM Coordination & Integration	65,931	0.01%
PGE2112	Zero Net Pilots	315,619	0.03%
PGE21131	Integrated Marketing	169,375	0.01%
PGE21132	Integrated Education & Training	12,837	0.00%
PGE21133	Integrated Sales Training	44,603	0.00%
PGE21134	Integration Support	241,130	0.02%
PGE2114	On-Bill Financing	1,562,803	0.14%
PGE2125	LGEAR	1,001,406	0.09%
PGE21251	Innovator Pilots Program	209,546	0.02%
PGE21252	Green Communities	1,585,776	0.14%
PGE21261	California Community Colleges	(4)	0.00%
PGE21262	California Community Colleges	862,317	0.08%
PGE21263	California Community Colleges	24,136	0.00%
PGE21264	California Community Colleges	198	0.00%
PGE2130	AMBAG Energy Watch	391,654	0.03%
PGE2131	City of San Joaquin Energy Watch	26,065	0.00%
PGE2132	East Bay Energy Watch	765,158	0.07%
PGE2133	Fresno County Energy Watch	316,416	0.03%
PGE2134	Kern County Energy Watch	313,571	0.03%
PGE2135	Madera County Energy Watch	23,176	0.00%
PGE2136	Marin County Energy Watch	160,698	0.01%
PGE2137	Mendocino County Energy Watch	26,065	0.00%
PGE2138	Napa County Energy Watch	67,256	0.01%
PGE2139	Redwood Energy Watch	157,831	0.01%
PGE2140	San Joaquin County Energy Watch	157,834	0.01%
PGE2141	San Luis Obispo County Energy Watch	101,152	0.01%
PGE2142	San Mateo County Energy Watch	184,687	0.02%
PGE2143	Santa Barbara County Energy Watch	103,268	0.01%
PGE2144	Sierra Nevada Energy Watch	263,524	0.02%
PGE2145	Sonoma County Energy Watch	144,865	0.01%
PGE2146	Silicon Valley Energy Watch	527,066	0.05%
PGE2147	San Francisco Energy Watch	632,748	0.06%
PGE2176	California New Homes Multifamily	206,008	0.02%
PGE2177	Enhance Time Delay Relay	99,365	0.01%
PGE2178	ENERGY STAR Manufactured Homes	106,779	0.01%
PGE2179	Direct Install for Manufactured and Mobi	107,784	0.01%
PGE2181	Air Care Plus	122,089	0.01%
PGE2182	Boiler Energy Efficiency Program	456,982	0.04%
PGE2183	Comprehensive Retail Energy Management	157,946	0.01%
PGE2185	EnergySmart Grocer	295,384	0.03%
PGE2186	Enhanced Automation Initiative	70,201	0.01%
PGE2187	Monitoring-Based Persistence Commissioni	82,292	0.01%
PGE2189	Cool Controls Plus	340,305	0.03%
PGE2190	LodgingSavers	266,908	0.02%
PGE2191	Medical Building Tune-Up	100,269	0.01%
PGE2193	School Energy Efficiency	131,699	0.01%
PGE2194	Energy Fitness Program	302,307	0.03%

PGE2195	Energy Savers	131,629	0.01%
PGE2196	RightLights	390,103	0.03%
PGE2197	Small Business Commercial Comprehensive	256,685	0.02%
PGE2198	DCCCP Quest	177,965	0.02%
PGE2199	Energy-Efficient Parking Garage	200,413	0.02%
PGE2200	Furniture Store Energy Efficiency	183,558	0.02%
PGE2201	High Performance Office Lighting	234,044	0.02%
PGE2202	LED Accelerator	222,576	0.02%
PGE2203	Monitoring-Based Commissioning	265,040	0.02%
PGE2204	SmartVent for Energy-Efficient Kitchens	216,365	0.02%
PGE2205	Casino Green	184,244	0.02%
PGE2206	Healthcare Energy Efficiency Program	299,159	0.03%
PGE2209	Ozone Laundry Energy Efficiency	177,097	0.02%
PGE2210	Cool Schools	94,800	0.01%
PGE2212	California Preschool Energy Efficiency P	83,138	0.01%
PGE2213	K-12 Private Schools and Colleges Audit	176,957	0.02%
PGE2214	EE Entertainment Centers	184,830	0.02%
PGE2220	AIM Compressed Air Efficiency	197,191	0.02%
PGE2221	California Wastewater Process Optimizati	116,742	0.01%
PGE2222	Energy Efficiency Services for Oil Produ	588,693	0.05%
PGE2223	Heavy Industry Energy Efficiency Program	613,499	0.05%
PGE2224	Industrial Compressed Air	199,905	0.02%
PGE2225	Refinery Energy Efficiency Program	341,366	0.03%
PGE2227	Cement Production and Distribution Energ	321,697	0.03%
PGE2228	Industrial Recommissioning Program	303,527	0.03%
PGE2230	Dairy Energy Efficiency Program	129,910	0.01%
PGE2231	Industrial Refrigeration Performance Plu	183,423	0.02%
PGE2232	Light Exchange Program	112,963	0.01%
PGE2233	Wine Industry Efficiency Solutions	123,603	0.01%
PGE2234	Comprehensive Food Process Audit & Resou	162,945	0.01%
PGE2235	Dairy Industry Resource Advantage Pgm	62,613	0.01%
PGE2236	Process Wastewater Treatment EM Pgm for	71,390	0.01%
PGE2240	Builder Energy Code Training	114,903	0.01%
PGE2241	Green Building Technical Support Service	125,925	0.01%
PGE2242	Cool Cash	250,898	0.02%
	Other	2,643	0.00%
Grand Total		63,500,215	5.55%

Exhibit A

Statement of Qualifications of Jeremy Waen

Q1 Mr. Waen, please state your name, position, and address.

A1 My name is Jeremy Waen. I am a Regulatory Analyst at Marin Energy Authority. My business address is 781 Lincoln Avenue, Suite 320, San Rafael, California 94901.

Q2 Please describe your background.

A2 I am a full-time employee for the Marin Energy Authority where I fulfill the role of Regulatory Analyst. I participate in proceedings on MEA's behalf on a wide range of topics that include, among others, greenhouse gas allowances, energy efficiency and cost allocation. I also assist MEA with maintaining regulatory compliance. Prior to working at MEA, I served as an Energy Analyst at the San Francisco Public Utilities Commission ("SFPUC") as part of their Regulatory and Legislative Affairs group within the Department of Power. There I participated in regulatory matters with the CPUC and CARB relating to SFPUC's interests as both an emerging Community Choice Aggregation, and a Publicly Owned Utility. Prior to that, I worked as an advocate for distributed generation of renewable energy with the Clean Coalition. I hold a Masters of Public Administration in Sustainable Management from the Presidio Graduate School, located in San Francisco, California. My resume is attached as Exhibit B.

Q3 What is the purpose of your testimony?

A3 I am sponsoring "Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for 2014 General Rate Case Phase 1."

Q4 Does this conclude your statement of qualifications?

A4 Yes it does.

Exhibit B

Resume of Jeremy Waen

JEREMY WAEN | REGULATORY ANALYST MARIN ENERGY AUTHORITY | 781 LINCOLN AVE, SUITE 320 | SAN RAFAEL, CA 94901

EXPERIENCE

Regulatory Analyst - *Marin Energy Authority* - San Rafael, CA **January 2012 - Present** Energy Analyst - *SF Public Utilities Commission* - San Francisco, CA **July 2011 – December 2011** Volunteer Associate - *Clean Coalition* - Palo Alto, CA **June 2010 - July 2011** Consultancy Intern - *Collective Invention* - Berkeley, CA **2009 - 2011** Research Chemist - *Applied Intellectual Capital Labs* - Alameda, CA **2007 - 2009** Research Assistant - *Lawrence Livermore National Laboratory* - Livermore, CA **Summer 2006** Research Assistant - *Caltech & NASA Jet Propulsion Laboratories* - Pasadena, CA **Summer 2004**

EDUCATION

MPA in Sustainable Management - *Presidio Graduate School* - San Francisco, CA **May 2011** BA in Chemistry - *Reed College* - Portland, OR **May 2006**

PRESENTATIONS & EVENTS

Young Professionals in Energy International Summit– 2nd Annual - Las Vegas, NV April, 2012 US Energy Policy Presentation - School of Renewable Energy Technology - Phitsanulok, Thailand January, 2012 ACS Summer School - Green Chemistry & Sustainable Energy - Montreal, Canada June-July, 2011 Young Professionals in Energy International Summit - 1st Annual - Las Vegas, NV April, 2011 Workshop: Lifecycle Assessment for Business Leaders - UC Berkeley - Berkeley, CA March, 2011 United Nations Framework Convention on Climate Change COP16 - Cancun, Mexico December, 2010

HIGHLIGHTS

- POLICY: Monitoring numerous proceedings at CPUC, CEC, & CARB for their impacts on Community Choice Aggregators (CCA). Advocating for fair and equitable CCA regulations through formal comments, protests, & testimony.
- COLLABORATION: Coordinating efficient cross-functional team operations. Assessing strengths, promoting collaboration, and optimizing problem-solving for elegant outcomes. Trained in multiple team-building techniques.
- ENGAGEMENT: Networking with NGOs, government agencies, industry associations, & activist groups about clean energy policy. Volunteering as event coordinator for San Francisco Bay Area Chapter of Young Professionals in Energy.
- STRATEGY: Consulted with local and regional governments: City of Brisbane & Joint Policy Committee. Researched data on jobs and economics related to development of electric vehicles, local renewable power, and energy efficiency.
- IMPLEMENTATION: Investigated urban redevelopment of retired naval base in the City of Alameda, CA. Engaged city staff, councils, utilities, businesses, citizens, and impacted tenants to propose alternate sustainable strategies. SCIENCE: Researched multiple clean technology topics in both laboratory and literature including flow-cell batteries for grid energy storage, batteries for electric vehicles, and waste remediation. Focused on sustainable green chemistry.
- FACILITATION: Supported scenario-planning session on systems thinking and life cycle assessment for US EPA's "Resource Conservation Challenge 2010 Workshop." Interviewed participants, compled results, and proposed action.
- FIELD WORK: Conducted successful 3-man month-long pilot-scale mine tailing remediation in Namibia, Africa. Fostered strong team development despite foreign environment, multinational participants, and hazardous conditions.

JEREMY WAEN

PREPARED TESTIMONY

 CPUC Application 12-06-002
 Opening Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for 2013 Energy Resource Recovery Account and Generation Non-Bypassable Charges Forecast (August 16, 2012)

- CPUC Application 12-03-001
 Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application for Approval of Economic Development Rate for 2012-2017 (August 24, 2012)
- CPUC Application 12-04-020
 Testimony of the Marin Energy Authority on Pacific Gas and Electric Company's Application to Establish a Green Option Tariff (October 19, 2012)